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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

MIN JIN ZHAO,

Defendant.

) NO. CR 21-00181-VC

) STIPULATION TO CONTINUE STATUS AND  
) EXCLUDE TIME TO APRIL 28, 2022, AND  
) [PROPOSED] ORDER AS MODIFIED

The parties are currently set for a status in this case on March 31, 2022. The parties have conferred, and stipulate to continue the March 31 status date to April 28, 2022, so to permit defense counsel additional time to review discovery and to confer with the defendant, who is in custody, to consider the government's plea offer.

In addition, the parties stipulate that time be excluded under the Speedy Trial Act through April 28, 2022, so that defense counsel can continue to prepare, including by reviewing the discovery already produced and consider the government's plea offer. For these reasons, the parties stipulate and agree that excluding time until April 28, 2022 will allow for the effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further stipulate and agree that the ends of justice served by excluding the time through April 28, 2022 from computation under the Speedy Trial Act outweigh the

best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

The undersigned Assistant United States Attorney certifies that he has obtained approval from counsel for the defendant to file this stipulation and proposed order.

IT IS SO STIPULATED.

DATED: 3/29/22

/s/  
ANKUR SHINGAL  
Assistant United States Attorney

DATED: 3/29/22

/s/  
ELIZABETH FALK  
Counsel for Defendant ZHAO

~~PROPOSED~~ ORDER AS MODIFIED

Based upon the facts set forth in the stipulation of the parties, the status conference is continued to April 28, 2022. The Court further finds that failing to exclude the time through April 28, 2022 would unreasonably deny defense counsel and the defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time from through April 28, 2022 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the time through April 28, 2022 shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(iv). \*\*\*No further extensions will be granted.

IT IS SO ORDERED.

DATED: March 31, 2022

